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District of Nevada

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7 || Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Defendant, Andrew Saul, Commissioner of Social Security (“Defendant”) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff’s Motion for Reversal and/or Remand by thirty days from July 10, 2019 to August 9, 2019. Defendant’s counsel has reviewed Plaintiff’s brief and it raises unique issues that counsel needs additional time to research. Since

<sup>24</sup> <sup>25</sup> <sup>26</sup> <sup>1</sup> Andrew Saul is now the Commissioner of Social Security and is automatically substituted as a party pursuant to Fed. R. Civ. P. 25(d). *See also* section 205(g) of the Social Security Act, 42 USC § 405(g) (action survives regardless of any change in the person occupying the office of Commissioner of Social Security).

1 Plaintiff filed his brief, Defendant's counsel has filed briefs in several other social security cases and  
2 been out of the office to conduct trainings for administrative law judges. Defendant's counsel has  
3 several briefs due in other social security cases within the next month and will be out of the office for  
4 work travel next week and the following week.

5 This request is made in good faith with no intention to unduly delay the proceedings.

6 Counsel apologizes to the Court for any inconvenience caused by this delay.

7 Counsel for Defendant contacted Plaintiff's counsel via telephone and email on July 8, and  
8 telephone on July 9, but has not received a response.  
9

10 Respectfully submitted this 9th day of July 2019.

11 NICHOLAS A. TRUTANICH  
12 United States Attorney

14 */s/ Chantal R. Jenkins*  
15 CHANTAL R. JENKINS  
16 Special Assistant United States Attorney

20 IT IS SO ORDERED:

21   
22 UNITED STATES MAGISTRATE JUDGE

23 7-11-2019  
24 DATED: \_\_\_\_\_  
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CERTIFICATE OF SERVICE

I, Chantal R. Jenkins, certify that the following individual was served with a copy of the  
MOTION FOR EXTENSION OF TIME on the date and via the method of service identified below:

**CM/ECF:**

Richard E. Donaldson  
Richard E. Donaldson, Esq., Chtd.  
2300 West Sahara Avenue  
Suite 800  
Las Vegas, NV 89102

Dated this 9th day of July 2019.

*/s/ Chantal R. Jenkins*  
CHANTAL R. JENKINS  
Special Assistant United States Attorney